



November 12, 2015

Mr. Steven Maslowski (3WP42)
NPDES Enforcement Branch
Water Protection Division
US Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029

**Re: Keystone Sanitary Landfill
October 15, 2015 Clean Water Act Section 308 Information Request**

Dear Mr. Maslowski:

This serves as the response by Keystone Sanitary Landfill, Inc. (Keystone) to the U.S. Environmental Protection Agency (EPA) Region III Clean Water Act Section 308 Request for Information, dated October 15, 2015 and received by Keystone on October 19, 2015 (Information Request).

We trust, upon review of this information, you will reach the same conclusion as the PaDEP and Scranton Sewer Authority i.e. "as a result of their investigation, on site inspections and analysis of their sampling testing program, that Keystone Sanitary Landfill was not the source of the compound of concern."

Although Keystone has made a diligent and good-faith effort to respond to the requests set forth in the Information Request as fully and completely as practicable within the period of time provided, Keystone nonetheless respectfully sets forth the objections stated in the attached to preserve its rights.

The responses below are based on the information available to Keystone as of the date of this response. Accordingly, Keystone respectfully reserves the right to amend or supplement the responses below if and when additional information is received.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Phone
(570) 343-5782

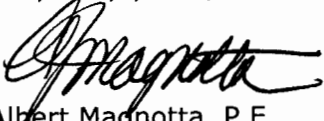
FAX
(570) 348-3135

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ISO 14001
CERTIFIED
COMPANY

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Should you need any additional information please contact me directly at (570) 650-7303.

Very truly yours,

A handwritten signature in black ink, appearing to read 'A. Magnotta', with a stylized flourish at the end.

Albert Magnotta, P.E.
Consultant
Keystone Sanitary Landfill, Inc.

Attachments

cc: Mr. R. Bellas, PaDEP

Formal Objections to Clean Water Act
Section 308 Information Request

General Objection No. 1: Keystone objects to the Information Request to the extent that it exceeds the authority granted to the U.S. Environmental Protection Agency under Section 308 of the of the Clean Water Act, 42 U.S.C. § 1318. Section 308 of the Clean Water Act only authorizes the utilization of such information requests for the purposes of “(1) developing or assisting in the development of any effluent limitation, or other limitation, prohibition, or effluent standard, pretreatment standard, or standard of performance under this chapter; (2) determining whether any person is in violation of any such effluent limitation, or other limitation, prohibition or effluent standard, pretreatment standard, or standard of performance; (3) any requirement established under this section; or (4) carrying out sections 1315, 1321, 1342, 1344 (relating to State permit programs), 1345, and 1364 of this title.” To the extent that the Information Request is seeking information concerning compliance with other federal statutes and regulations, the Information Request exceeds EPA’s authority under Section 308 of the Clean Water Act.

General Objection No. 2: Keystone objects to the Information Request to the extent that it seeks information not relevant to the purposes stated in the Request and Section 308 of the Clean Water Act.

General Objection No. 3: Keystone objects to the Information Request to the extent that it seeks, or otherwise requires Keystone to generate, collect, or compile, information that Keystone is not required to generate, collect, compile, maintain or preserve pursuant to the Clean Water Act and its implementing regulations.

General Objection No. 4: Keystone objects to the Information Request to the extent that it seeks information that is protected from disclosure by the attorney client or other privilege and/or the attorney work-product doctrine.

General Objection No. 5: Keystone objects to the Information Request to the extent it states and/or contends that the “Keystone Landfill” is a “point source.”

General Objection No. 6: Keystone objects to the Information Request as vague (the Information Request uses undefined and ambiguous terms, such as “discharge”), overbroad in scope, unauthorized by law, and unduly burdensome.



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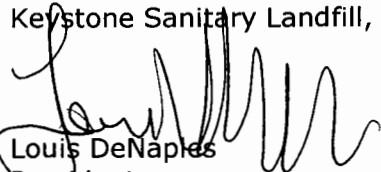
Mr. Steven Maslowski (3WP42)
NPDES Enforcement Branch
Water Protection Division
US Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103-2029

Re: EPA Correspondence to Keystone dated 10-16-15

Dear Mr. Maslowski:

Please be advised that Albert Magnotta, P.E. and consultant for Keystone Sanitary Landfill, Inc. has been duly authorized to respond to the above referenced correspondence.

Sincerely,
Keystone Sanitary Landfill, Inc.



Louis DeNaples
President

Keystone Response 25 a:

A map of Keystone's operation in Dunmore and Throop is enclosed for your review. (Exhibit A) (CECO Associates, Consulting Engineers)

Keystone Response 25 b:

See Schematic (Exhibit B). (Jim Eiden)

The chemicals used in the treatment process:

50% sodium hydroxide – maximum daily amount (in lbs) 1500
sulfuric acid (70 baume) – maximum daily amount (in lbs) 3000
liquid polymer emulsion – maximum daily amount – 11 x 5 gallon pails
phosphoric acid – maximum daily amount – 55 gal drum

Keystone Response 25 c:

Industrial Wastewater Contribution Permit Number 97-007, issued to Keystone by the SSA on April 1, 2012, authorizes Keystone to discharge wastewater to manhole 57 of the Roaring Brook Trunk line (Exhibit C). The Leachate Acceptance Agreement executed November 2, 1987 authorizes Keystone to use the Reeves Street line (Exhibit D). (Dan O'Brien)

Keystone Response 25 d:

Please refer to (Exhibit A). (CECO Associates, Consulting Engineers)

Keystone Response 25 e:

Keystone Landfill, Inc. and the Scranton Sewer Authority executed a Leachate Acceptance Agreement on November 2, 1987. This Agreement acknowledges and authorizes Keystone to convey pretreated leachate via an on-site pumping station to the Authority's sanitary sewer system at Reeves Street with subsequent treatment at the SSA Wastewater Treatment Plant. (Exhibit D). (Dan O'Brien)

Keystone Response 26:

The flow to SSA for the period September 1 through September 30 was 2,561,350 gal.

See attached for sampling data during that time period (Exhibit E). (Jim Eiden)

Keystone Response 27:

Keystone discharged to the SSA through the dedicated line from September 1st through the early morning hours of September 25th. There was no discharge from the treatment plant for the remainder of the day of the 25th and no discharge on the 26th, 27th, or 28th. The treatment plant returned to service on September 29th. The discharge was to the dedicated line to Drinker Street. (Jim Eiden)

Keystone Response 28:

See attached (Exhibit F). (Jim Eiden)

Keystone Response 29:

A refrigerated discrete sampler is setup to collect a 24 hour composite sample from the neutralization tank (labeled #17 on the Attached 26b) prior to discharge to the effluent pump station and subsequently to the SSA via the dedicated line. Following the 24 hour period, the composite sample container is removed from the sampler. A well mixed sample is then portioned to pre-labeled and preserved bottles, provided by Hawk Mtn. Labs, for analysis of the composite-associated parameters. Parameters requiring grab samples are

also taken from the neutralization tank. A field pH is done at this time on a hand held, calibrated meter. A chain of custody is completed for the samples with the required information and the field pH is documented on this sheet. This procedure is repeated for three consecutive days with each quarter. (Jim Eiden)

Keystone Response 30:

Sample bottle preparation and analyses are done by: (Jim Eiden)

Hawk Mtn. Labs, Inc.
201 West Clay Ave.
Hazle Twp., PA 18202

PaDEP Lab # 40-417
EPA PA 00169

Keystone Response 31:

Keystone Sanitary Landfill, Inc. is owned and operated by: (Dan O'Brien)

Louis DeNaples
Dominick DeNaples
400 Mill Street
Dunmore, PA 18512

Landfill Managers are as follows:

Joseph Dexter, Site Manager (Part Time)
Dan O'Brien, Business Manager
Dominick DeNaples, Jr., Asst. Site Manager
Michael Bair, Gas Management
Jim Eiden, Compliance Manager/Treatment Plant Operator
Brooke Reynolds, Air Quality Manager
Frank Ultsh, Crusher and Processing Plant Supervisor
New Treatment Plant Construction Supervisor
Bill Miller, Landfill Supervisor
Scott Spencer, Landfill Construction Supervisor

Keystone Response 32:

Please refer to enclosed documents (Exhibit G). (Dan O'Brien)

Keystone Response 33:

Please refer to enclosed documents (Exhibit H). (Dan O'Brien)

Keystone Response 34:

Over the past 3 years: (Jim Eiden)

Average daily flow	= 86,565 gal/day
Average weekly flow	= 604,883 gal/wk
Average monthly flow	= 2,705,176 gal/mo

Keystone Response 35:

Keystone did not split samples with PaDEP on the days in question, although routine quarterly effluent samples were taken as per our SSA permit on September 24th (Exhibit E). (Jim Eiden)

Keystone Response 36:

Same as 29. (Jim Eiden)

Keystone Response 37:

During the period in question, there were no procedures in place. An eight-foot key would be required to open the sub-surface valve. Since that time a cover has been welded on the valve box and the SSA has provided a lock and controls the key. (Jim Eiden)

Keystone Response 38:

Yes, the valve that controls the alternate sewer line to Monahan Ave. was open. The valve was found to be improperly seated and required 3 additional rotations to completely close. (Jim Eiden)

Keystone Response 39:

The Reeves Street alternate line has been used on an infrequent and irregular basis over the last 25 years. Permission to implement this procedure was obtained from the SSA in June 1999 and March 2003. Refer to Exhibit I for the relevant correspondence. (Jim Eiden/Dan O'Brien)

Keystone Response 40:

KSL did not discharge the oily substance that is the subject of this inquiry (Exhibit J). (Jim Eiden/Dan O'Brien)

Keystone Response 41:

Please refer to enclosed documents (Exhibit K). (Jim Eiden/Dan O'Brien)

Keystone Response 42:

Again, Keystone did not discharge the "oily substance" that is the subject of this inquiry and Keystone has no knowledge of its origin (Exhibit J). (Jim Eiden/Dan O'Brien)